

## **EXHIBIT “B”**

**Paul D. Polidoro**  
**Associate General Counsel**  
**WATCH TOWER BIBLE AND TRACT**  
**SOCIETY OF PENNSYLVANIA**  
**Legal Department**  
**100 Watchtower Drive**  
**Patterson, NY 12563**  
**Tel: 845-306-1000**  
**Email: [ppolidor@jw.org](mailto:ppolidor@jw.org)**  
**Attorney For Plaintiff**

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

---

**In Re DMCA Subpoena to YouTube (Google, Inc.)**

**X Case No. \_\_\_\_\_**

**:**

**: Declaration of Paul D. Polidoro in  
: Support of Watch Tower Bible  
: and Tract Society's Request to the  
: Clerk for Issuance of Subpoena to  
: YouTube (Google, Inc.), Pursuant  
: to 17 U.S.C. § 512(h) to Identify  
: Alleged Infringers**

**X**

---

I, Paul D. Polidoro, counsel of record for Petitioner, Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower"), in the above-referenced matter, hereby declare as follows:

1. I am authorized to act on behalf of Watch Tower.
2. I submit this declaration in support of Watch Tower's request for issuance to YouTube (Google, Inc.) of a subpoena, pursuant to the Digital Millennium Copyright Act (DMCA) 17 U.S.C. § 512(h) (hereinafter "DMCA Subpoena"), to identify the user identified as: "Kevin McFree".
3. Pursuant to 17 U.S.C. § 512 (c)(3)(A), Watch Tower submitted notifications to YouTube (Google, Inc.) identifying the infringing content posted by the aforementioned user and provided the information required by 17 U.S.C. §

512 (c)(3)(A). True and accurate copies of the submitted notifications are attached hereto as **Exhibit 1**.

4. The purpose for which this DMCA Subpoena is sought is to obtain the identity of an alleged infringer and such information will only be used for the purpose of protecting Watch Tower's rights under title 17 U.S.C. §§ 100, *et. seq.*

I declare under penalty of perjury under the laws of the State of New York and United States of America that the foregoing is true and correct. Executed this 15th day of June 2018.



Paul D. Polidoro  
Associate General Counsel  
SDNY Bar No. PP2509  
WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA  
Legal Department  
100 Watchtower Drive  
Patterson, NY 12563  
Telephone: 845-306-1000  
Facsimile: 845-306-0709  
Attorney for Plaintiff